### EXHIBIT 2

02/09/2016 13:42 (FAX) P.001/005

08-13555-mg Doc 52027-2 Filed 02/16/16 Entered 02/16/16 16:13:10 Exhibit 2 Pg 2 of 6

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

LEHMAN BROTHERS HOLDINGS INC., et al.
DEBTOR

Chapter 11 Case No. 08-13555 (SCC)

NOTICE OF MOTION/MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH TO FILE AN NOTICE OFAPPEAL TO THE JPM CHASE SETTLEMENT AGREEMENT

#### Sir/Madam:

PLEASE TAKE NOTICE, THAT THE UNDERSIGNED, WILLIAM KUNTZ, III WHO APPEARS HERE PRO SE, WILL MOVE FOR AN ORDER EXTENDING THE TIME WITHIN WHICH TO FILE A NOTICE OF APPEAL. PLEASE TAKE NOTICE THAT THE COURT MAY RULE WITH OR WITHOUT PAPERS IN OPPOSITION AND WITH OR WITHOUT A HEARING.

RESPECTFULLY,

WILLIAM KUNTZ, III INDIA ST PO BOX 1801 NANTUCKET ISLAND, MA 02554-1801

### MOTION

AS REFLECTED PAPERS ALREADY FILED WITH THE COURT, MOVANT HAD FILED 3 CLAIMS BASED UPON THE ABSORBING OF A \$3 MILLION ESCROW FUND ESTABLISHED FROM THE GRAND UNION COMPANY'S FIRST BANKRUPTCY BEFORE JUDGE WALSH IN DELAWARE.

SOMETIME DURING THE PENDANCY OF THE 2<sup>ND</sup> AND 3<sup>RD</sup> BANKRUPTCY, THIS FUND WAS AFTER A FASHION PUT INTO THE HANDS OF LEHMAN PRIOR TO THE COMMENCEMENT OF THIS CASE. AT THAT TIME, UPON INFORMATION AND BELIEF, WEIL, GOTSHAL WAS BOTH CO-COUNSELTO THE DEBTOR AND ALSO APPARENTLY COUNSEL TO LEHMAN.

DURING THE PRIOR PROCEEDINGS HELD BEFORE JUDGE PECK, WEIL, GOTSHALMOVED TO HAVE THOSE CLAIMS EXPUNGED.

AT OR SUBSEQUENT TO THAT EXPUNGEMENT, MOVANT LEARNED THAT THE NEW YORK STATE COMPTROLLER WAS AND IS HOLDING CERTAIN INTERESTS IN LEHMAN. DEPENDING ON THE EXACT NATURE OF THOSE INTERESTS MOVANT MAY HAVE CLEAR STANDING TO PUT FORWARD COMMENTS WITH RESPECT TO THE SETTLEMENT REPORTED AS APPROVED ON THE 8<sup>TH</sup> OF FEB, 2016 AS REPORTED IN LAW 360 <ATTACHED>

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AS THE COURT MAY NOTE, MOVANT FILED PAPERS WITH THE COURT CLERK WHICH WERE DOCKET. THOSE PAPERS WERE DELIVERED TO THE NEW YORK COURTHOUSE ON THE MORNING OF THE 2<sup>ND</sup> OF FEB, 2016 < ATTACHED >

NOTWITHSTANDING HIS COMPLIANCE WITH THE REQUIREMENTS OF THE NOTICE COUNSEL FOR THE COMMITTEE AND THE DEBTOR FILED A PAPER INDICATING THAT "NO OBJECTION" HAD BEEN FILED. COUNSEL INDICATED THAT MOVANT HAD <u>'EMAILED'</u> THE COURT, WHICH IS NOT CORRECT.

SUBSEQUENT TO THE PAPERS FILED BY MOVANT, A WRITTEN REQUEST WAS MADE TO THE NEW YORK STATE COMPTROLLER'S OFFICE FOR THE EXACT DETAILS OF THE LEHMAN INTERESTS HELD BY THE COMPTROLLER'S OFFICE FOR THE BENEFIT OF MOVANT.\<ATTACHED>

IT GOES WITHOUT EXPANSION THAT THIS CASE HAS EXCITED MUCH PUBLIC INTEREST AND MORE RECENTLY HUGE COMMENTARY FROM CERTAIN PUBLIC PERSONS ABOUT THE EXACT NATURE OF THE WAY WALL STREET CONDUCTS IT'S AFFAIRS, WHICH OF COURSE EXTENDS TO THE OPERATION OF THE BANKRUPTCY COURT'S IN DEALING WITH SUCH 'MEGA=CASES' SUCH AS LEHMAN AND ACCORDINGLY, MOVANT HAD REQUESTED THAT THE COURT APPOINT A SUCESSOR EXAMINER.

TO THE BEST OF MOVANTS KNOWLEDGE, THERE HAS BEEN NO REPLY FROM THE NEW YORK STATE COMPTROLLER'S OFFICE.

ACCORDINGLY, MOVANT WOULD RESPECTFULLY REQUEST THAT THE COURT EXTEND THE TIME WITHIN WHICH TO FILE A NOTICE OF APPEAL.

RESPECTFULLY,

WILLIAM KUNTZ, III INDIA ST PO BOX 1801 NANTUCKET ISLAND, MA 02554-1801

FEB 9, 2016 Chazy, New York

# Lehman Gets Nod On \$1.4B JPMorgan Settlement

### By Jonathan Randles

Law360, New York (February 8, 2016, 7:38 PM ET) -- A New York bankruptcy judge on Monday approved a \$1.42 billion settlement to resolve most litigation between Lehman Brothers Holdings Inc. and JPMorgan over transactions that occurred in the runup to Lehman's 2008 bankruptcy.

Lehman Brothers had accused JPMorgan of contributing to the investment bank's epic downfall in September 2008. (Credit: AP) The deal, approved by U.S. Bankruptcy Judge Shelley Chapman, resolves two of the three major pieces of litigation Lehman had brought against JPMorgan and, when combined with a related release of a debtor deposit,...

**02/09/2016 13:44** (FAX) P.004/005 08-13555-mg Doc 52027-2 Filed 02/16/16 Entered 02/16/16 16:13:10 Exhibit 2

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## lehman papers feb 2016-Tracking Number: 9505510548966030019257 -Updated Delivery Day: Tuesday, February 2, 2016 (2)

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January 30, 2016, 12:10 pm	Departed Post Office	CHAZY, NY 12921
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Feb 4, 2016

NY STATE COMPTROLLER'S OFFICE OF UNCLAIMED FUNDS fax 518-270-2222

FOIL Request < expedited >

Sir/Madam:

In reviewing the data base, I see that the details on my holdings in Lehman Brothers

have been purged.

Would you be so kind as to provide that info asap?

I thank you in advance,

William Kuntz, III

India St PO Box 1801

Nantucket Island, Ma 02554-1801

HP Officejet Pro 8610 Series

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### Last Transaction

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